

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION**

<p>ROBERT A. LATHAM and THE TAYLOR GROUP, Individually and on Behalf of All Others Similarly Situated,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>MITCHELL J. STEIN, BILL MATTHEWS, PAMELA M. BUNES, BUDIMIR S. DRAKULIC, ROBERT C. SCHERNE, KEVIN F. PICKARD, LOWELL T. HARMISON, MARVIN H. FINK and SIGNALIFE, INC.,</p> <p style="text-align: center;">Defendants.</p>	<p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p>	<p style="text-align: center;">Case No. 6:08-cv-02995-JMC</p>
<p>DARRYL K. ROTH and THE TAYLOR GROUP, Individually and on Behalf of All Others Similarly Situated,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>MITCHELL J. STEIN, WILLIAM R. MATTHEWS, PAMELA M. BUNES, BUDIMIR S. DRAKULIC, ROBERT C. SCHERNE, KEVIN F. PICKARD, LOWELL T. HARMISON, MARVIN H. FINK and SIGNALIFE, INC.</p> <p style="text-align: center;">Defendants.</p>	<p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p>	<p style="text-align: center;">Case No. 08-cv-3183-JMC</p>

**LEAD PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION
SETTLEMENT, PLAN OF ALLOCATION, TO CERTIFY A CLASS FOR
SETTLEMENT PURPOSES, FOR ENTRY OF THE ORDER AND FINAL JUDGMENT,
AWARD OF ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES AND
APPROVAL OF COMPENSATORY AWARDS**

Lead Plaintiffs Bryan D. Harris, Mark Taylor and Gregory Taylor (“Lead Plaintiffs”), by and through counsel, hereby respectfully move this Court for an order: (1) finally approving the class action settlement; (2) approving the plan of allocation; (3) certifying a class for settlement purposes; (4) entering the Order and Final Judgment; (5) awarding attorneys’ fees and expenses; and (6) approving compensatory awards to Lead Plaintiffs. In support thereof, Lead Plaintiffs rely on the contemporaneously filed memoranda and supporting declaration of Joseph P. Guglielmo, with exhibits.

Dated: June 29, 2011

Respectfully submitted,

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Lead Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on June 29, 2011, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Electronic Mail Notice List, and I hereby certify that I caused the foregoing document or paper to be mailed via the United States Postal Service to the non-CM/ECF participants indicated on the Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 29, 2011.

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